

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

ELIZABETH HILL,	:	Chapter 13
EDWARD HILL,	:	
Debtor	:	Bankruptcy No: 15-14914

**MOTION TO CONVERT FROM CHAPTER 13 CASE
TO CASE UNDER CHAPTER 7**

COMES NOW, the Debtors Elizabeth and Edward Hill who file this motion to convert from a Chapter 13 to a Chapter 7 and in support thereof, says:

1. The Debtors are Elizabeth and Edward Hill.
2. The Debtors filed a petition for protection pursuant to Chapter 13 of the Bankruptcy Act 11 U.S.C. § 101 et. seq.
3. The Debtor had been able to make her plan payments so long as her husband lived and she had his support.
4. The Debtor's husband died on or about April 7, 2016 and solely as a result of his death, the debtor is no longer able to make her plan payments.

WHEREFORE, the Debtors, **Elizabeth and Edward Hill**, pray this Honorable Court to:

- A. Grant relief in accordance with Chapter 7 of the Bankruptcy Code; and
- B. Grant such other relief as this Court deems fitting and just.

Dated: 11/29/2017

/s/Joseph Bambrick
Joseph T. Bambrick, Jr., Esquire
Attorney for Debtor
Bar No. 45112
529 Reading Avenue, Suite K
West Reading, PA 19611

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

ELIZABETH HILL,	:	Chapter 13
EDWARD HILL,	:	
Debtor	:	Bankruptcy No: 15-14914

O R D E R

AND NOW, the Debtor's Motion to Convert From a Chapter 13 Case to a Chapter 7 Case is
GRANTED.

BY THE COURT,

**Richard E. Fehling,
U.S. BANKRUPTCY JUDGE**

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

ELIZABETH HILL,	:	Chapter 13
EDWARD HILL,	:	
Debtor	:	Bankruptcy No: 15-14914

CERTIFICATE OF SERVICE

I, Tiffany Dease, Paralegal for the law firm of Joseph T. Bambrick, Jr., Esquire, hereby certify that I mailed a filed copy of the Debtor's **Motion to Convert Case**, via First Class Mail, postage prepaid, this 29th day of November, 2017 to the following:

CHAPTER 13 TRUSTEE

Frederick Reigle, Esq.
Via ECF: ecfmail@fredreiglech13.com

UNITED STATES TRUSTEE

U.S. Trustee's Office
Via ECF: **USTPRegion03.PH.ECF@usdoj.gov**

DEBTOR

Elizabeth and Edward Hill
4344 New Holland Road
Mohnton, PA 19540

CREDITORS

See attached list.

/s/Tiffany Dease

Tiffany Dease

Bank of New York Nationstar
Mortgage
PO Box 619098
Dallas, TX 75261

Citibank, N.A.
701 East Falls 60th St. North
Sioux Falls, SD 57117

Diamond credit Union
1600 Medicare Drive
Pottstown, PA 19464

Midland Funding LLC
P.O. Box 2011
Warren, MI 48090

Portfolio Recovery Associates,
LLC
P.O. Box 41067
Norfolk, VA 23541

US Postal Service FCU
7905 Malcolm Road, 4th Floor
Clinton, MD 20735

Capital One Bank
PO Box 30281
Salt Lake City, UT 84130

Citiflex/ Citibank
PO Box 6497
Sioux Falls, SD 57117

Kohls
PO Box 3115
Milwaukee, WI 53201

National Bank of Omaha
PO Box 3412
Omaha, NE 68103

Syncb/Nations
PO Box 965036
Orlando, FL 32896

Vativ Recovery Solutions
PO Box 40728
Houston, TX 77240

Children's Place
PO Box 6497
Sioux Falls, SD 57117

Comenity Bank/ Bonton
PO Box 182789
Columbus, OH 43218

Medical Reading Dermatology
2208 Quarry Drive
Reading, PA 19609

Physician Billing Office
PO Box 102388
Atlanta, GA 30368

Syncb/Sams Club
PO Box 965036
Orlando, FL 32896